

ZUB

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
)
v.)
)
MICHAEL T. CONAHAN, and)
MARK A. CIAVARELLA,)
)
Defendants.)

NO. 3:CR-09-28

(JUDGE KOSIK)

UNDER SEAL

FILED
HARRISBURG, PA

JUL 13 2009

MARY E. D'ANDREA, CLERK
Per PY
Deputy Clerk

MOTION TO SEAL

AND NOW, the United States of America, by its undersigned counsel, moves pursuant to Rule 6 of the Federal Rules of Criminal Procedure to file the documents accompanying this Motion under seal for the reasons set forth in the accompanying sealed declaration in support of the government's motion to seal.

WHEREFORE, for the foregoing reasons, the United States moves to seal this Motion and the above-referenced pleadings. For the convenience of the Court, a proposed form of Order is attached.

Respectfully submitted,
MARTIN C. CARLSON
UNITED STATES ATTORNEY

/s/ Gordon A.D. Zubrod
GORDON A.D. ZUBROD
Assistant U.S. Attorney
228 Walnut Street
P.O. Box 11754
Harrisburg, PA 17108
717-221-4482 (Office)
717-221-2246 (Fax)
Gordon.Zubrod@usdoj.gov
PA 20792